

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

PAULETTE MYERS JAMES,

Plaintiff,

v.

SASE COMPANY, LLC,

Defendant.

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Case No.: 3:18-CV-356

RULE 26(f) DISCOVERY PLAN

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Defendant SASE Intermediate Holdings, Inc., misidentified in the case caption as SASE Company, LLC, and Plaintiff Paulette Myers James (the “Parties”) submit the following Discovery Plan.

The Parties have considered the nature and bases of their claims and defenses and the possibilities for promptly settling or resolving the case. The Parties may resume their discussions during the progress of this case and as may be directed by the Court.

The Parties have discussed discovery issues and scheduling and have agreed to the following plan:

1. Rule 26(f) Conference. The Parties have conferred via telephone and email regarding a discovery plan.

2. Rule 26(a)(1) Initial Disclosures. The Parties will exchange their initial disclosures pursuant to Fed. Rule Civ. Pro. 26(a)(1) on or before April 29, 2019. The Parties are

not aware of any changes that should be made in the timing, form or requirements for their 26(a) disclosures.

3. Discovery Plan.

A. Subjects of Discovery.

Presently, the Parties anticipate the following subjects will need to be explored in discovery:

- i. Plaintiff's hours worked;
- ii. Defendant's payroll information;
- iii. Plaintiff's actual job duties;
- iv. Plaintiff's discrimination claims;
- v. Plaintiff's termination and subsequent employment.
- VI Defendant's emails between Paulette Myers James and John Abrahamson 09/1/2016 to 3/1/2018**

B. Timing of Discovery.

Issues in dispute are relatively straightforward. It is anticipated that discovery can be completed within the time provided in the Court's Scheduling Order.

The parties propose the following discovery deadlines and phasing, in line with the Court's Scheduling Order:

Completion of written fact discovery	June 8,2019
Deadline to amend pleadings	June 25, 2019
Completion of fact witness depositions	July 31, 2019

Deadline for Plaintiff to disclose expert witnesses,
including reports and available dates for depositions

July 15, 2019

Deadline for Defendant to disclose expert witnesses,
including reports and available dates for depositions

August 15, 2019

Completion of expert witness depositions

September 27, 2019

C. Electronically Stored Information.

Undersigned counsel is inquiring with their client about the nature and volume of electronically stored information (“ESI”) and will meet and confer prior to the production of documents and other ESI in an attempt to reach a mutually-agreeable ESI plan.

D. Privilege and Protection of Confidential Information.

There are no known issues at this time relating to any claim of privilege or of protection of materials as trial-preparation materials. The Parties agree that if a party discloses information, documents, data or other material that it thereafter determines should not have been disclosed or produced pursuant to any applicable privilege, the disclosing party has the right to insist upon the return of such information, documents, data or material, and all copies thereof, pending the Court’s ruling upon the applicability of any privilege pursuant to any motion to compel discovery that the requesting party might file or a motion for protective order that the disclosing party might file.

E. Changes to Discovery Plan.

For “good cause” shown, any party may seek a timely amendment to the provisions of the Discovery Plan, but in no event shall any such amendments shorten any deadlines set forth in the Court's Scheduling Order.

4. **Prospects of Settlement.** At this time, the prospect of settlement is low.

5. **Anticipated Trial Length.** As set forth in the Scheduling Order, the estimated trial length is 4 days. A trial start date has been set for June 8, 2020.

Dated this 15th day of April, 2019.

Respectfully submitted,

s/ Charles K. Grant

Charles K. Grant, No. 017081
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
211 Commerce Street, Suite 1000
Nashville, Tennessee 37201
(615) 726-5600 (telephone)
(615) 726-0464 (facsimile)
Attorney for Defendant

s/ Paulette Myers James (with permission)

Paulette Myers James, Plaintiff
Appearing *Pro Se*
6709 47th Street Ct W
University Place, WA 98466
(253) 720-8033

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2019, the foregoing was filed via the Court's Electronic Filing System. Notice of this filing will be sent to all Parties:

Paulette Myers James
6709 47th Street Ct W
University Place, WA 98466

s/ Charles K. Grant
Charles K. Grant